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June 25, 2010

**VIA OVERNIGHT DELIVERY**

Mr. Charles L.A. Terreni  
Chief Clerk/Administrator  
SC Public Service Commission  
101 Executive Center Dr., Ste. 100  
Columbia, SC 29210  
(803) 896-5100

Re: LIFECONNEX TELECOM, LLC  
Docket No. 2010-180-C

Dear Mr. Terreni:

Enclosed please find for filing an original and twenty-five (25) copies of the company's pre-filed testimony. The company does not intend to engage in telemarketing in the State of South Carolina.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

Angela Janssen  
Legal Assistant to Lance J.M. Steinhart  
Attorney for LIFECONNEX TELECOM, LLC

Enclosure

cc: Edward Heard  
Nanette S. Edwards – ORS via e-mail: [nsedwar@regstaff.sc.gov](mailto:nsedwar@regstaff.sc.gov)  
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BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2010-180-C

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2010 JUL 23 5:13:47  
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PUBLIC SERVICE  
COMMISSION

IN RE: APPLICATION OF	)	
LIFECONNEX TELECOM, LLC	)	
AUTHORITY TO OPERATE AS A	)	DIRECT TESTIMONY
RESELLER OF INTEREXCHANGE	)	OF PAUL T. WATSON
TELECOMMUNICATION SERVICES	)	
WITHIN THE STATE OF	)	
SOUTH CAROLINA	)	

I. Introduction

1.     **Q.     Please state your name and business address.**
- A.     My name is Paul T. Watson. My business address is 13700 Perdido Key Drive,  
              Unit 222, Pensacola, Florida 32507.
2.     **Q.     By whom are you employed and in what capacity?**
- A.     I am Chief Operating Officer of LifeConnex Telecom, LLC ("LifeConnex").
3.     **Q.     Please give a brief description of your background and experience in business  
              and telecommunications.**
- A.     My background and experience, as well as other members of the management team  
              of LifeConnex, is set forth in Attachment 4 to our application.

4. Q. What is the purpose of your testimony?

A. The purpose of my testimony is to describe the nature of LifeConnex's proposed service offering within the State of South Carolina, and to demonstrate its financial, managerial, and technical ability to provide the telecommunications services for which authority is sought herein.

5. Q. Do you wish to incorporate by reference any documents into your testimony?

A. Yes. I wish to incorporate by reference the underlying Application filed in this proceeding and its associated attachments.

## II. The Business of LifeConnex

6. Q. Has LifeConnex registered to do business in South Carolina?

A. Yes. LifeConnex is a Florida Limited Liability Company that has received authorization to transact business within the State of South Carolina. A copy of LifeConnex's Articles of Organization is attached to the Application as Attachment "1" and a copy of the document of authorization from the State of South Carolina is attached to that Application as Attachment "2".

1       7.       **Q.     Please describe the services LifeConnex intends to provide within the State of**  
2                   **South Carolina.**

3       A.     LifeConnex seeks authority to operate as a reseller of intraLATA and interLATA  
4           intrastate telecommunications services to the public on a statewide basis.  
5           LifeConnex seeks authority to offer on a resale basis within South Carolina  
6           intrastate, interLATA and, to the extent authorized by the Commission, intraLATA  
7           direct-dialed services including (1+) service, flat rate service, 800 inbound service,  
8           and travel cards and prepaid calling cards. LifeConnex seeks statewide authority to  
9           provide intraLATA services authorized by the Commission in Docket Nos. 92-182-  
10          C, 92-183-C, and 92-200-C. LifeConnex has no plans at this time to construct any  
11          telecommunications transmission facilities of its own and seeks no construction  
12          authority. LifeConnex will operate exclusively as a reseller. LifeConnex intends  
13          to engage in "switchless" resale. LifeConnex will arrange for the traffic of  
14          underlying subscribers to be routed directly over the networks of Applicant's  
15          network providers.

16      8.       **Q.     What carrier will LifeConnex utilize as its underlying carriers for services in**  
17                   **South Carolina?**

18      A.     LifeConnex intends to utilize BellSouth Telecommunications, Inc. d/b/a AT&T  
19           South Carolina ("AT&T") or other facilities-based long distance companies as its  
20           underlying carriers. LifeConnex will choose its underlying carriers based upon the  
21           quality of service of the carrier properly certified by the Commission to provide  
22           such service.  
23

1     9.     **Q.     Is LifeConnex currently authorized to provide intrastate telecommunications**  
2                   **services in any other state?**

3           A.     Yes. LifeConnex is currently authorized to provide such services in the following  
4                   states: Alabama, Arkansas, Colorado, D.C., Florida, Idaho, Indiana, Iowa, Kansas,  
5                   Kentucky, Louisiana, Massachusetts, Michigan, New Hampshire, New Jersey,  
6                   New Mexico, New York, North Carolina, North Dakota, Oklahoma, Oregon,  
7                   Rhode Island, South Carolina, Tennessee, Utah, Vermont, Washington and  
8                   Wisconsin. Lifeconnex was issued a Certificate of Public Convenience and  
9                   Necessity to Provide Local Exchange Services in the State of South Carolina per  
10                  Order dated July 14, 2009 in Docket No. 2008-428-C (issued in name of Swiftel,  
11                  LLC). The Commission issued an Order dated September 18, 2009 Approving  
12                  Change of Name to Lifeconnex Telecom, LLC.

13    10.     **Q.     Does LifeConnex intend to file a tariff with the Commission?**

14           A.     Yes. LifeConnex filed a tariff along with its Application in this proceeding which it  
15                   will modify as necessary in order to meet the Commission's requirements. We  
16                   believe LifeConnex's Tariff will comport with all Orders, Rules, and Regulations of  
17                   the Commission.

18    11.     **Q.     Will LifeConnex comply with the Commission's orders regarding the resale of**  
19                   **interexchange carrier services?**

20           A.     Yes. LifeConnex will at all times provide and market interexchange carrier services  
21                   in accordance with current Commission policies. In addition, LifeConnex at all  
22                   times will provide interstate services in compliance with all FCC rules and  
23                   regulations.  
24

1 12. Q. Has LifeConnex provided any intrastate telecommunications services within  
2 the State of South Carolina?

3 A. Yes.

4 13. Q. What rates will LifeConnex charge upon receipt of certification?

5 A. LifeConnex will charge the tariffed rates approved by the Commission.

6 14. Q. How will LifeConnex market services in South Carolina?

7 A. LifeConnex intends to market its services via direct sales by LifeConnex's  
8 employees and independent sales agents.

9 III. Managerial, Technical and Financial Qualifications

10 15. Q. Does LifeConnex have sufficient managerial, technical, and financial resources  
11 and ability to provide the telecommunications services proposed in its  
12 Application?

13 A. Yes. LifeConnex has sufficient technical, financial, and managerial resources and  
14 ability to provide the telecommunications services for which authority is sought  
15 herein. LifeConnex's personnel represent a broad spectrum of business and  
16 technical disciplines, possessing many years of individual and aggregate  
17 telecommunications experience.

18 My qualifications and experience are discussed on Attachment 4 to our application,  
19 which attachment also supports Applicant's managerial and technical ability to  
20 provide the services for which authority is sought herein.  
21

1 16. Q. **How does LifeConnex handle customer service requests?**

2 A. LifeConnex's customer service department handles all such requests. LifeConnex  
3 can be reached by toll free number.

4 17. Q. **Please describe the financial condition of LifeConnex.**

5 A. In support of LifeConnex's financial ability to provide the services sought herein,  
6 LifeConnex's Balance Sheet and Profit & Loss Statement as of October 31, 2009  
7 was submitted as Attachment 5 to the Application.

8 IV. Public Interest

9  
10 18. Q. **How will residents of South Carolina benefit from LifeConnex's services and**  
11 **presence in South Carolina?**

12 A. Commission approval should bring the following long-term benefits to telephone  
13 users:

14 (1) More competition, additional services and a better product at competitive  
15 prices;

16 (2) Increased consumer choice as well as innovative telecommunications  
17 services;

18 (3) Efficient use of existing communications resources as well as increased  
19 diversification and reliability of supply of communications services;

20 (4) Development of an expanded telecommunications supply industry in South  
21 Carolina;

1 (5) An expanded tax base and revenue source for the State of South Carolina;

2 And;

3 (6) Additional sources of revenues for Local Exchange Companies through  
4 access charges and billing and collection fees.

5  
6 19. Q. Will the Company agree to abide by and comply with the Commissions' Rules  
7 and Regulations and Commission Orders in its operations in South Carolina?

8 A. Yes.

9 20. Q. Does this conclude your testimony?

10 A. Yes. I would like to thank the Commission for this opportunity to provide  
11 information relevant to LifeConnex's Application and am ready to provide any  
12 additional information that the Commission may need in making its decision.